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FEB 19 1992

Mr. Dan Tschirgi
Hazardous Waste Section
Waste Management Program
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, Missouri 65102

Re: Van Waters & Rogers - Kansas City, Missouri
EPA ID# MOD007158157

Dear Mr. Tschirgi:

Enclosed is a copy of the final Environmental Priority Initiative Preliminary Assessment (EPI/PA) report for the Van Waters & Rogers facility in Kansas City, Missouri. The Environmental Protection Agency (EPA) considers this report equivalent to a RCRA Facility Assessment (RFA) since a Sampling Visit is not needed. At this time, EPA has identified several Areas of Concern (AOCs) for possible further action.

The first AOC is the Orthodichlorobenzene Disposal Area. Sometime in the 1970's, two tons of orthodichlorobenzene contaminated grain was buried in a trench on VWR's property. Limited soil sampling has been performed at this facility and it is not known to what extent this contaminated grain has migrated.

The second AOC is the Former Facility Location. During the EPI/PA investigation, little information regarding waste management practices at the former facility (dating back to 1910) could be found. It is known that the former facility handled several chemicals, possibly similar to those which are currently handled by VWR. And, in 1966, a fire at the facility destroyed a solvent repackaging/flammable storage building and approximately 300 barrels of chemicals.

The third Area of Concern is the Acid Storage Tank Farm Area (which includes a neutralization tank). This area has a concrete dike and gravel floor. On September 20, 1991, VWR reported a spill of 46,432 pounds of Hydrochloric Acid (product). The facility submitted a report on November 18, 1991, indicating that they had a spill and provided a description of their emergency response, clean-up and corrective action activities. During the VSI, VWR indicated that they were planning on providing a concrete base to this unit. However, to this date, it is unknown whether VWR has completed this work.

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RCRA RECORDS CENTER

Since VWR is requesting a RCRA operating permit, these Areas of Concern will most likely be addressed under the HSWA portion of the permit. A RFA Approval Form is enclosed for your files. If you have any additional information or questions with regards to this report, please contact Katherine Bello, of my staff, at (913) 551-7450.

Sincerely Yours,

Lyndell L. Harrington, P.E.
Chief, Permits Section
RCRA Branch
Waste Management Division

Enclosure

ATTACHMENT I - RFA APPROVAL FORM

Facility Name VNR-Kansas City.
Facility Location Kansas City, Missouri
ID Number MOD 007158157
Date RFA Approved 2-18-92.

Is RFI needed? ☒ Y ☐ N
Can CMS be imposed now? ☒ Y ☐ N - for one SWMU? Acid Storage Tank Area.
Are IM needed? Y ☒ N

Number of SWMUs requiring action 3

Priority for Corrective Action
(Circle One) 1 2 3 4 ☒ 5 6 7 8 9 10

Low----->Medium-----> High

(Low Exposure Potential) (Potential Exposure) (Actual Exposure)

Choice of oversight strategy (based on severity of environmental harm, characteristics of owner/operator, and level of concern (see CAOS for more information).

- ☐ Voluntary: without a permit or order
☐ Quasi-Voluntary: minimal oversight, no EPA plan approvals
☒ Briefing/Audit: limited oversight, progress briefings only
☒ Hybrid: more oversight, plan reviews, site visits
☐ Full: intensive oversight, all plans reviewed, regular site visits
- based on or c/o -

Signature Katherine C. Bello

Date 2-18-92.